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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**FORTY-FOURTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD MAY 1, 2023 THROUGH MAY 31, 2023**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	May 1, 2023 through May 31, 2023
Amount of compensation sought as actual, reasonable, and necessary:	\$366,947.20 (80% of \$458,684.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$65,003.51 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this forty-fourth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing May 1, 2023 through May 31, 2023 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$458,684.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$366,947.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$992.55. The blended hourly rate of paraprofessionals during the Application Period is \$251.56.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$6,765.51 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$6,765.51.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$58,238.00. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$366,947.20 (80% of \$458,684.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$65,003.51 (100%), for a total amount of \$431,950.71 for the Application Period.

Dated: July 14, 2023
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	6.0	\$1,350.00
A008	Hearings	6.0	\$8,400.00
A009	Meetings / Communications with AHC & Creditors	7.8	\$13,380.00
A015	Non-Working Travel (Billed @ 50%)	37.2	\$17,655.00
A019	Plan / Disclosure Statement	9.5	\$14,870.00
A020	Insurance Adversary Proceeding	428.7	\$403,029.00
		495.2	\$458,684.00

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate ²	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Special Counsel / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,950.00	12.3	\$23,985.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,600.00	44.6	\$71,360.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988 U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,600.00	45.0	\$72,000.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,450.00	3.0	\$4,350.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$1,000.00 \$500.00	104.8 26.4	\$104,800.00 \$13,200.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the S. D. of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the S. D. of New York – 2022	\$825.00	58.6	\$48,345.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$825.00 \$412.50	74.5 10.8	\$61,462.50 \$4,455.00
Alison Gaske	Associate / District of Columbia – 2016	\$725.00	24.9	\$18,052.50
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$725.00	6.9	\$5,002.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$525.00	18.9	\$9,922.50

² Non-working travel is billed @ 50% of regular hourly rates.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate²	Hours Billed for Period	Total Fees for Period
December Huddleston	Associate / District of Columbia – 2021	\$525.00	20.2	\$10,605.00
Nick Poz	Paralegal – Joined firm in 2022	\$350.00	4.1	\$1,435.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$265.00	16.6	\$4,399.00
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225.00	23.6	\$5,310.00
	Totals		495.2	\$458,684.00
	Attorney Blended Rate	\$992.55		
	Paraprofessional Blended Rate	\$251.56		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contracted Professional Fees	\$859.75
Depositions / Transcripts	\$2,284.35
Messenger & Delivery	\$197.33
Travel – Airfare	\$870.60
Travel – Lodging	\$1,050.00
Travel – Meals	\$246.99
Travel – Mileage	\$421.17
Travel – Miscellaneous (Baggage Fees)	\$70.00
Travel – Parking	\$58.00
Travel – Taxi/Ubers	\$356.71
Travel – Tolls	\$13.61
Travel – Train	\$337.00
Total	\$6,765.51

Exhibit D

Summary of Expenses Incurred and Not Yet Paid

SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID

DESCRIPTION	Total Expenses for Period
Insurance Consulting Expert A	\$58,238.00
Total	\$58,238.00

Exhibit E

Time and Expense Detail

GILBERT LLP

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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

June 29, 2023
Invoice Number: 11330468
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2023

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	458,684.00	6,765.51	465,449.51
Total	458,684.00	6,765.51	465,449.51

TOTAL FEES \$ 458,684.00

TOTAL EXPENSES \$ 6,765.51

TOTAL FEES AND EXPENSES \$ 465,449.51

FOR PROFESSIONAL SERVICES RENDERED through May 31, 2023

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	5/01/23	Review court docket for pleadings recently filed in case.	1.70	382.50
Turner, C.	5/08/23	Review court docket for recently-filed pleadings.	1.40	315.00
Turner, C.	5/15/23	Review court docket for pleadings recently filed in case.	1.10	247.50
Turner, C.	5/22/23	Review court docket for pleadings recently filed in case.	1.80	405.00
Project Total:			6.00	\$ 1,350.00

A008: Hearings

Name	Date	Services	Hours	Amount
Shore, R.	5/23/23	Appear for status conference re adversary proceeding.	2.00	3,200.00
Rubinstein, J.	5/23/23	Attend status conference hearing.	2.00	2,000.00
Leveridge, R.	5/23/23	Attend and participate in insurance adversary status conference and omnibus hearing.	2.00	3,200.00
Project Total:			6.00	\$ 8,400.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	5/01/23	Confer with J. Rice re Plan B.	.50	975.00
Shore, R.	5/01/23	Review status report to AHC re stay issue.	.30	480.00
Gilbert, S.	5/04/23	Attend meeting with AHC working group, Fifteen and Sackler representatives re Plan B.	2.00	3,900.00
Gilbert, S.	5/16/23	Confer with AHC working group re Plan B.	1.00	1,950.00
Gilbert, S.	5/30/23	Confer with clients re Second Circuit opinion.	.50	975.00
Gilbert, S.	5/31/23	Meet with AHC re Second Circuit opinion and strategy.	.80	1,560.00
Quinn, K.	5/31/23	Participate in call with clients re Second Circuit opinion.	.80	1,160.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/31/23	Confer with AHC re Second Circuit decision.	.80	1,280.00
Rubinstein, J.	5/31/23	Review ACH communications re strategy (0.3); participate in call with AHC re Second Circuit decision (0.8).	1.10	1,100.00
Project Total:			7.80	\$ 13,380.00

A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Rubinstein, J.	5/09/23	Travel from Washington, DC to Chicago, IL for deposition.	5.30	2,650.00
Rush, M.	5/09/23	Travel from Washington, DC to Chicago, IL for deposition.	5.30	2,186.25
Rush, M.	5/10/23	Travel from Chicago, IL to Washington, DC after deposition.	5.50	2,268.75
Rubinstein, J.	5/11/23	Travel from Chicago, IL (after deposition) to Stamford, CT for deposition preparation meeting (4.8); travel from Stamford, CT to Potomac, MD (5.5).	10.30	5,150.00
Rubinstein, J.	5/18/23	Travel from Potomac, MD to Stamford, CT (roundtrip) for deposition.	10.80	5,400.00
Project Total:			37.20	\$ 17,655.00

A019: Plan / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	5/01/23	Confer with G. Uzzi re Plan B.	1.00	1,950.00
Gilbert, S.	5/01/23	Draft outline and agenda for meeting with state re Plan B.	.90	1,755.00
Gilbert, S.	5/12/23	Confer with G. Uzzi re Plan B.	.60	1,170.00
Gilbert, S.	5/30/23	Confer with K. Eckstein re Second Circuit opinion.	.50	975.00
Gilbert, S.	5/30/23	Confer with plaintiffs' counsel re Second Circuit opinion and options.	.80	1,560.00
Gilbert, S.	5/30/23	Review Second Circuit opinion.	1.00	1,950.00
Quinn, K.	5/30/23	Review Second Circuit opinion.	1.80	2,610.00
Rubinstein, J.	5/30/23	Analysis of Second Circuit decision re plan for insurance-related implications.	2.90	2,900.00
Project Total:			9.50	\$ 14,870.00

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A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	5/01/23	Confer with R. Leveridge and J. Rubinstein re strategy.	.40	640.00
Shore, R.	5/01/23	Confer with R. Leveridge, J. Rubinstein, and M. Rush re Issue #34.	.60	960.00
Shore, R.	5/01/23	Review and revise letter to insurers re adversary stay (0.5); review revisions to letter from Debtors' counsel and UCC counsel (0.6); communicate with D. Windscheffel re same (0.1).	1.20	1,920.00
Shore, R.	5/01/23	Review communication to counsel for Insurer #25.	.10	160.00
Shore, R.	5/01/23	Communicate with UCC and S. Gilbert re Issue #69.	.10	160.00
Rubinstein, J.	5/01/23	Review status of Liberty policy stipulation (0.3); confer with R. Shore and R. Leveridge re strategy (0.4); review materials in preparation for Deponent #16 deposition (1.2); review proposed edits from co-counsel to Insurer #24 discovery letter (0.4); review discovery correspondence re Rule 30(b)(6) deposition from Gulf/St. Paul (1.1); correspond with co-counsel re case management issues (0.8); confer with R. Shore, R. Leveridge and M. Rush re Issue #34 (0.6).	4.80	4,800.00
Rush, M.	5/01/23	Review materials in preparation for deposition of Deponent #16.	3.10	2,557.50
Rush, M.	5/01/23	Confer with J. Rubinstein, R. Leveridge, and R. Shore re Issue #34.	.60	495.00
Rush, M.	5/01/23	Revise letter to C. Sorenson re discovery.	.40	330.00
Gaske, A.	5/01/23	Correspond with Liberty re policy stipulation.	.30	217.50
Leveridge, R.	5/01/23	Confer with R. Shore and J. Rubinstein re strategy.	.40	640.00
Leveridge, R.	5/01/23	Communicate with Consulting Expert A re project status.	.30	480.00
Leveridge, R.	5/01/23	Confer with R. Shore, J. Rubinstein, and M. Rush re deposition planning and strategy.	.60	960.00
Leveridge, R.	5/01/23	Communicate with co-counsel re letter to Court re schedule (0.4); review revisions to letter from R. Shore and Debtors' counsel (0.4); communicate with R. Shore re same (0.3); communicate with J. Rubinstein re same (0.4).	1.50	2,400.00
Turner, C.	5/01/23	Review and organize answers and affirmative defenses.	.20	45.00
Agwu, I.	5/01/23	Continue summarizing Deponent #19 deposition transcript.	3.00	1,575.00

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Name	Date	Services	Hours	Amount
Poz, N.	5/01/23	Review and organize recent discovery communications with Insurers #27 and #36.	.20	70.00
Rubinstein, J.	5/02/23	Correspond with Consulting Expert A and R. Leveridge re status of project (0.1); review materials in preparation for Deponent #16 deposition (2.0); provide comments re supplemental questions from M. Rush (0.5); review updated deposition outline (2.1); review discovery correspondence re Insurer #24 (0.2); update litigation task list (0.6); review correspondence to insurers re case management (0.1); outline response to correspondence from Insurer #24 counsel re same (0.3).	5.90	5,900.00
Rush, M.	5/02/23	Continue reviewing materials in preparation for deposition of Deponent #16.	2.20	1,815.00
Rush, M.	5/02/23	Revise letter to Insurer #25 re discovery.	.40	330.00
Gaske, A.	5/02/23	Correspond with counsel for Gulf and St. Paul re policy stipulation (0.1); draft summary of status of policy stipulations (0.3).	.40	290.00
Leveridge, R.	5/02/23	Review communication from Debtors' counsel to insurers' counsel re schedule issues.	.30	480.00
Leveridge, R.	5/02/23	Communication with Consulting Expert A re project status.	.40	640.00
Ogrey, S.	5/02/23	Prepare materials for Deponent #16 deposition.	.30	79.50
Turner, C.	5/02/23	Revise deposition tracking spreadsheet.	.80	180.00
Agwu, I.	5/02/23	Continue summarizing Deponent #19 deposition.	2.00	1,050.00
Dougherty, J.	5/02/23	Review documents selected for offensive and defensive depositions re strategy.	3.30	2,722.50
Rubinstein, J.	5/03/23	Revise Deponent #16 deposition outline (0.9); draft response to discovery-related correspondence from Insurer #25 (1.9); communicate with co-plaintiffs re same (0.3); review pleadings filed re third-party subpoenas and analysis (0.5); communicate with R. Leveridge re strategy (0.3); review and provide comments on Insurers #9, #25, and #30 Rule 30(b)(6) letter (0.5); correspond with co-counsel re Deponent #6 deposition (0.3); coordinate deposition preparation schedule re Deponent #6 (0.5).	5.20	5,200.00
Rush, M.	5/03/23	Continue reviewing case-related materials in preparation for deposition of Deponent #16.	2.20	1,815.00
Rush, M.	5/03/23	Review letter from Insurer #25 re Rule 30(b)(6) deposition.	.40	330.00
Leveridge, R.	5/03/23	Communicate with M. Rush and J. Rubinstein re Insurer #25 deposition and other discovery matters (0.8); review notices of subpoena issued by opposing counsel (0.3).	1.10	1,760.00

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Name	Date	Services	Hours	Amount
Ogrey, S.	5/03/23	Continue to prepare materials for Deponent #16 deposition.	1.50	397.50
Turner, C.	5/03/23	Review and organize third-party subpoenas.	.10	22.50
Turner, C.	5/03/23	Review and update deposition tracking spreadsheet.	2.10	472.50
Agwu, I.	5/03/23	Continue summarizing Deponent #19 deposition.	3.50	1,837.50
Poz, N.	5/03/23	Organize discovery-related correspondence with Insurers #9 and #25.	.40	140.00
Poz, N.	5/03/23	Research certain documents for Deponent #16 deposition.	.30	105.00
Poz, N.	5/03/23	Review subpoenas served by Insurers #19 and #20.	.40	140.00
Dougherty, J.	5/03/23	Continue reviewing documents for offensive and defensive depositions re strategy.	3.60	2,970.00
Shore, R.	5/04/23	Confer with co-counsel re stay and discovery issues.	.40	640.00
Shore, R.	5/04/23	Confer with R. Leveridge and J. Rubinstein re strategy.	.30	480.00
Shore, R.	5/04/23	Confer with team re case status and strategy.	.40	640.00
Rubinstein, J.	5/04/23	Correspond with co-counsel re preparation for deposition of Deponent #6 (0.4); review correspondence from AHC co-counsel (0.2); review discovery correspondence from insurer counsel (0.2); communicate with co-counsel re response (0.2); participate in call with co-counsel re strategy (0.4); confer with team re strategy (0.4); confer with R. Shore and R. Leveridge re same (0.3); identify previously analyzed transcripts of Deponent #13 (0.5); begin review of relevant materials in preparation for depositions of Deponents #17 and #21 (1.2); review co-counsel comments to Deponent #16 deposition outline (0.3).	4.10	4,100.00
Rush, M.	5/04/23	Confer with team re case status and strategy.	.40	330.00
Gaske, A.	5/04/23	Confer with team re case strategy and status.	.40	290.00
Leveridge, R.	5/04/23	Confer with co-counsel re discovery and other related matters.	.40	640.00
Leveridge, R.	5/04/23	Confer with team re litigation status and next steps (0.4); confer with R. Shore and J. Rubinstein re same (0.3).	.70	1,120.00
Ogrey, S.	5/04/23	Organize exhibits for Deponent #16 deposition.	1.20	318.00
Ogrey, S.	5/04/23	Confer with team re case status and strategy.	.40	106.00
Sraders, S.	5/04/23	Confer with team re recent developments and strategy for next steps.	.40	290.00

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Name	Date	Services	Hours	Amount
Turner, C.	5/04/23	Review and organize third-party subpoenas.	1.30	292.50
Turner, C.	5/04/23	Confer with team re litigation strategy and case updates.	.40	90.00
Huddleston, D.	5/04/23	Confer with team re case status and next steps.	.40	210.00
Agwu, I.	5/04/23	Confer with team re case update.	.40	210.00
Agwu, I.	5/04/23	Continue summarizing Deponent #19 deposition transcript.	3.00	1,575.00
Poz, N.	5/04/23	Organize discovery-related correspondence with Insurer #25.	.20	70.00
Poz, N.	5/04/23	Update new deposition calendar.	.40	140.00
Poz, N.	5/04/23	Confer with team re case status and next steps.	.40	140.00
Dougherty, J.	5/04/23	Confer with team re litigation status and next steps (0.4); continue reviewing documents for offensive and defensive depositions re strategy (3.4).	3.80	3,135.00
Rubinstein, J.	5/05/23	Communicate with co-counsel re comments to relevant documents in preparation for deposition of Deponent #17 (0.5); review revisions to materials relevant to Deponent #6 for deposition preparation sessions (1.3); begin review of historic transcripts of Deponent #21 for deposition preparation sessions (4.3).	6.10	6,100.00
Rush, M.	5/05/23	Revise outline for Deponent #16.	.30	247.50
Gaske, A.	5/05/23	Review previous deposition transcript of Deponent #13.	4.10	2,972.50
Gaske, A.	5/05/23	Review communication from Liberty counsel re policy stipulation.	.20	145.00
Leveridge, R.	5/05/23	Communicate with Consulting Expert A and J. Rubinstein re project progress.	.40	640.00
Ogrey, S.	5/05/23	Review materials for Deponent #16 deposition.	3.50	927.50
Huddleston, D.	5/05/23	Communicate with A. Gaske re review of Deponent #13 deposition transcript.	.20	105.00
Huddleston, D.	5/05/23	Analyze prior deposition transcript of Deponent #13.	2.40	1,260.00
Poz, N.	5/05/23	Research certain materials for Deponent #6 deposition.	.20	70.00
Dougherty, J.	5/05/23	Continue reviewing documents for offensive and defensive depositions re strategy.	2.80	2,310.00
Rubinstein, J.	5/07/23	Communicate with R. Leveridge and R. Shore re strategy (0.1); correspond with A. Gaske re Liberty policy stipulation (0.1); correspond with Consulting Expert A and R. Leveridge re analysis of project (0.3).	.50	500.00
Leveridge, R.	5/07/23	Communicate with M. Rush re discovery-related communications with insurers.	.30	480.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/08/23	Communicate with co-counsel re Deponent #6 deposition preparation (0.2); review correspondence with co-counsel re Liberty policy stipulation revisions (0.1); review correspondence from Consulting Expert A re analysis/status (0.6); confer with R. Leveridge re Consulting Expert A analysis (0.4); continue review of materials re deposition preparation for Deponent #21 (4.0); correspond with M. Rush re Deponent #16 preparation (0.3).	5.60	5,600.00
Rush, M.	5/08/23	Review materials and outline in preparation for deposition of Deponent #16.	4.50	3,712.50
Gaske, A.	5/08/23	Revise Liberty policy stipulation pursuant to Liberty edits.	1.10	797.50
Gaske, A.	5/08/23	Review prior deposition transcripts of Deponent #13.	2.10	1,522.50
Leveridge, R.	5/08/23	Communicate with Consulting Expert A re analysis (0.6); review material from Consulting Expert A (1.2); confer with J. Rubinstein re same (0.4).	2.20	3,520.00
Leveridge, R.	5/08/23	Communicate with J. Rubinstein re deposition schedule.	.30	480.00
Leveridge, R.	5/08/23	Review communications between co-counsel and opposing counsel re schedule.	.20	320.00
Ogrey, S.	5/08/23	Continue to prepare materials for Deponent #16 deposition.	1.50	397.50
Turner, C.	5/08/23	Revise draft Liberty policy stipulation exhibits.	6.30	1,417.50
Huddleston, D.	5/08/23	Continue analyzing Deponent #13 prior deposition transcript.	3.00	1,575.00
Dougherty, J.	5/08/23	Continue analyzing documents for offensive and defensive depositions re strategy.	3.70	3,052.50
Shore, R.	5/09/23	Review proposal re Issue #69.	.60	960.00
Shore, R.	5/09/23	Review, revise and provide comments to memorandum re Issue #52.	4.20	6,720.00
Rubinstein, J.	5/09/23	Review materials for Deponent #16 deposition (0.7); revise draft outline provided by co-counsel re same (1.0); review materials in preparation for Deponent #21 deposition (0.7).	2.40	2,400.00
Rush, M.	5/09/23	Continue reviewing materials in preparation for deposition of Deponent #16.	2.20	1,815.00
Gaske, A.	5/09/23	Review remainder of prior transcript for Deponent #13.	2.20	1,595.00
Gaske, A.	5/09/23	Correspond with co-counsel re execution of Aspen and SCRS Elite policy stipulations.	.20	145.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	5/09/23	Review Consulting Expert A analysis (0.7); confer with Consulting Expert A re project status (0.4).	1.10	1,760.00
Ogrey, S.	5/09/23	Continue preparing materials for Deponent #16 deposition.	.30	79.50
Huddleston, D.	5/09/23	Continue reviewing prior deposition transcript of Deponent #13.	5.50	2,887.50
Huddleston, D.	5/09/23	Research law re Issue #27.	.30	157.50
Huddleston, D.	5/09/23	Review A. Gaske notes from Deponent #13 prior deposition.	.10	52.50
Agwu, I.	5/09/23	Continue summarizing Deponent #19 deposition transcript.	3.50	1,837.50
Dougherty, J.	5/09/23	Continue reviewing documents collected for offensive and defensive depositions re strategy.	1.60	1,320.00
Shore, R.	5/10/23	Communicate with R. Leveridge and J. Rubinstein re proposed case management order from Insurer #2.	.40	640.00
Shore, R.	5/10/23	Review case schedule.	1.00	1,600.00
Rubinstein, J.	5/10/23	Attend S. Ordarczenko deposition (8.7); review correspondence re discovery issues (0.3).	9.00	9,000.00
Rush, M.	5/10/23	Review outline and exhibits in preparation for deposition of S. Ordarczenko.	1.50	1,237.50
Rush, M.	5/10/23	Attend deposition of S. Ordarczenko.	8.70	7,177.50
Gaske, A.	5/10/23	Review R. Shore edits to memorandum re Issue #52.	.80	580.00
Leveridge, R.	5/10/23	Review proposed case management order from Insurer #2 (0.4); provide comments re same (0.8).	1.20	1,920.00
Ogrey, S.	5/10/23	Present exhibits at deposition of Deponent #16.	7.30	1,934.50
Ogrey, S.	5/10/23	Organize exhibits for deposition of Deponent #16.	.60	159.00
Sraders, S.	5/10/23	Analyze R. Shore comments to memorandum re Issue #52.	.80	580.00
Turner, C.	5/10/23	Review and organize deposition materials.	2.40	540.00
Huddleston, D.	5/10/23	Continue analyzing prior deposition transcript of Deponent #13.	4.50	2,362.50
Agwu, I.	5/10/23	Continue summarizing Deponent #19 deposition transcript.	3.00	1,575.00
Dougherty, J.	5/10/23	Review documents collected for offensive and defensive depositions re strategy (3.3); draft order of proof document synthesizing documents, deposition testimony, and key themes and proof points for internal review and additional development in anticipation of use in motions practice, presentations, and at trial (3.6).	6.90	5,692.50

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Name	Date	Services	Hours	Amount
Shore, R.	5/11/23	Review and comment on letter to insurers re stay.	1.00	1,600.00
Rubinstein, J.	5/11/23	Participate in Deponent #6 deposition preparation session (5.5); revise pleading re Issue #69 (0.7).	6.20	6,200.00
Rush, M.	5/11/23	Meet with co-counsel and Deponent #6 to prepare for deposition.	5.30	4,372.50
Gaske, A.	5/11/23	Review overview of prior deposition transcripts of Deponent #13.	1.30	942.50
Gaske, A.	5/11/23	Review R. Shore edits to memorandum on Issue #52.	.30	217.50
Sraders, S.	5/11/23	Communicate with A. Gaske re analysis of Issue #52.	.10	72.50
Huddleston, D.	5/11/23	Revise summary of prior deposition transcript of Deponent #13.	2.30	1,207.50
Poz, N.	5/11/23	Review rough transcript of Deponent #16 deposition.	.30	105.00
Shore, R.	5/12/23	Confer with J. Rubinstein, S. Sraders, and A. Gaske re analysis of Issue #52.	.80	1,280.00
Shore, R.	5/12/23	Confer with M. Rush re Issue #14.	1.00	1,600.00
Shore, R.	5/12/23	Communicate with R. Leveridge and J. Rubinstein re edits from insurer's counsel to proposed letter to Court.	.40	640.00
Shore, R.	5/12/23	Confer with A. Kramer re Issue #69 (0.2); analyze argument re same (0.6).	.80	1,280.00
Rubinstein, J.	5/12/23	Review insurer edits to letter to Court re case management (0.9); confer with R. Leveridge re various discovery projects (0.5); revise Issue #69 related document (1.6); communicate with co-counsel re same (0.2); analyze documents re Deponent #6 preparation (1.1); analysis re St. Paul/Gulf policy stipulation (0.2); confer with R. Shore, S. Sraders, and A. Gaske re Issue #52 (0.8); communicate with team re discovery deadline extensions requested by insurers (0.2).	5.50	5,500.00
Rush, M.	5/12/23	Communicate with J. Rubinstein re Insurer #25 depositions.	.50	412.50
Rush, M.	5/12/23	Confer with R. Shore re Issue #14.	1.00	825.00
Gaske, A.	5/12/23	Confer with R. Shore, J. Rubinstein, and S. Sraders re memorandum on Issue #52.	.80	580.00
Gaske, A.	5/12/23	Confer with S. Sraders re memorandum on Issue #52.	.30	217.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	5/12/23	Communicate with co-counsel re Issue #69 (0.6); review edits from insurer's counsel to proposed joint letter to Judge Lane (0.4); communicate with R. Shore and J. Rubinstein re same (0.4); communicate with co-counsel re same (0.3).	1.70	2,720.00
Leveridge, R.	5/12/23	Review communications with opposing counsel and co-counsel re discovery matters.	.60	960.00
Sraders, S.	5/12/23	Confer with A. Gaske re memorandum re Issue #52.	.30	217.50
Sraders, S.	5/12/23	Confer with R. Shore, J. Rubinstein, and A. Gaske re Issue #52.	.80	580.00
Sraders, S.	5/12/23	Analyze Issue #52.	.30	217.50
Turner, C.	5/12/23	Review and organize Deponent #16 deposition materials.	.20	45.00
Dougherty, J.	5/12/23	Draft order of proof document synthesizing documents, deposition testimony, and key themes and proof points for internal review and additional development in anticipation of use in motions practice, presentations, and at trial.	2.80	2,310.00
Rubinstein, J.	5/14/23	Final review and execution of SRCS and Aspen policy stipulations (0.4); review article re Issue #53 (0.2).	.60	600.00
Leveridge, R.	5/14/23	Review insurance coverage filing in another matter on relevant topics.	.90	1,440.00
Shore, R.	5/15/23	Confer with J. Rubinstein and R. Leveridge re strategy.	.30	480.00
Rubinstein, J.	5/15/23	Analysis re Issue #53 (2.3); review deposition scheduling (0.5); review status of finalizing policy stipulations re SRCS and Aspen (0.4); confer with R. Shore and R. Leveridge re strategy (0.3).	3.50	3,500.00
Rush, M.	5/15/23	Draft letter to Insurer #25 re depositions and discovery.	4.20	3,465.00
Rush, M.	5/15/23	Research re Issue #14.	2.80	2,310.00
Gaske, A.	5/15/23	Draft status of policy stipulations and executed policy stipulations for A. Crawford.	1.10	797.50
Gaske, A.	5/15/23	Correspond with counsel for SRCS Elite and Aspen re discovery.	.20	145.00
Leveridge, R.	5/15/23	Confer with R. Shore and J. Rubinstein re strategy.	.30	480.00
Turner, C.	5/15/23	Draft Rule 30(b)(1) deposition notices for Deponents #22 and #23.	.40	90.00
Dougherty, J.	5/15/23	Review documents introduced as exhibits to defensive witnesses re strategy.	5.40	4,455.00
Shore, R.	5/16/23	Review letter to Court re case management.	1.00	1,600.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/16/23	Confer with co-plaintiffs' counsel re letter to Court.	.50	800.00
Rubinstein, J.	5/16/23	Review timing of upcoming depositions (0.3); review third-party subpoena to Pinney Associates (0.5); revise draft co-counsel correspondence re status of policy stipulations across insurer groups (0.2); review materials in preparation for deposition of Deponent #21 (1.0); revise draft discovery letter to Navigators (0.5); analysis of brief from separate matter re Issue #14 (2.2); confer with co-counsel re letter to Court re case management (0.4).	5.10	5,100.00
Rush, M.	5/16/23	Continue drafting letter to Insurer #25 re depositions and discovery.	3.70	3,052.50
Rush, M.	5/16/23	Analyze status of Rule 30(b)(6) discussions with Insurer #25.	.60	495.00
Gaske, A.	5/16/23	Correspond with A. Crawford re status of policy stipulations.	.20	145.00
Gaske, A.	5/16/23	Review policy stipulation proposal from St. Paul and Gulf.	1.50	1,087.50
Leveridge, R.	5/16/23	Communicate with J. Rubinstein and M. Rush re discovery issues.	.60	960.00
Leveridge, R.	5/16/23	Confer with co-counsel re schedule and other litigation related matters.	.40	640.00
Leveridge, R.	5/16/23	Communicate with counsel for Deponent #13 re deposition scheduling.	.30	480.00
Sraders, S.	5/16/23	Revise memorandum re Issue #52.	.70	507.50
Turner, C.	5/16/23	Review and organize third-party subpoenas.	.30	67.50
Turner, C.	5/16/23	Revise deposition notices of Deponents #22 and #23.	.20	45.00
Poz, N.	5/16/23	Communicate with Veritext re deposition transcript of Deponent #16.	.20	70.00
Poz, N.	5/16/23	Communicate with team re status of certain final deposition transcripts.	.20	70.00
Dougherty, J.	5/16/23	Continue reviewing documents introduced as exhibits to defensive witnesses re strategy.	4.80	3,960.00
Shore, R.	5/17/23	Communicate with R. Leveridge and J. Rubinstein re Issue #69.	.40	640.00
Shore, R.	5/17/23	Review Issue #69 strategy in preparation for call with UCC.	.60	960.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	5/17/23	Review correspondence re discovery extensions (0.2); review correspondence re production of Debtors' privilege logs (0.2); communicate with insurer counsel re deposition scheduling (0.9); communicate with co-counsel re Issue #69 (0.5); confer with R. Leveridge re strategy (0.5); confer with Debtors' counsel re deposition preparation re multiple witnesses (1.1); review served deposition notices re Insurer #25 (0.1); confer with A. Gaske re policy stipulations re Gulf and St. Paul (0.5).	4.00	4,000.00
Rush, M.	5/17/23	Analyze status of Rule 30(b)(6) discussions with Insurer #25.	2.40	1,980.00
Rush, M.	5/17/23	Summarize status of case law re Issue #14.	.90	742.50
Rush, M.	5/17/23	Draft response to letter from Gulf/St. Paul.	1.50	1,237.50
Gaske, A.	5/17/23	Confer with J. Rubinstein re Gulf and St. Policy edits to policy stipulation.	.50	362.50
Gaske, A.	5/17/23	Review memorandum re Issue #52.	.70	507.50
Gaske, A.	5/17/23	Review policy language in Bermuda policies.	1.60	1,160.00
Leveridge, R.	5/17/23	Confer with counsel for Deponent #13 re deposition scheduling (0.7); communicate with co-counsel re same (0.3); communicate with J. Rubinstein and M. Rush re deposition coverage (0.4); review Deponent #13 previous deposition excerpts (0.7); communication with A. Gaske and D. Huddleston re same (0.2).	2.30	3,680.00
Leveridge, R.	5/17/23	Review communication from co-counsel re Issue #69 (0.4); communicate with R. Shore and J. Rubinstein re same (0.4); communications with co-counsel re same (0.3).	1.10	1,760.00
Leveridge, R.	5/17/23	Communicate with J. Rubinstein re deposition preparation and scheduling.	.40	640.00
Sraders, S.	5/17/23	Analyze Insurer #2 policy to respond to questions from R. Shore.	1.80	1,305.00
Sraders, S.	5/17/23	Revise draft memorandum re Issue #52.	.50	362.50
Turner, C.	5/17/23	Review and organize deposition materials of Deponents #22 and #23.	1.10	247.50
Poz, N.	5/17/23	Review parties' counsel communications and calendar extension for Insurer #33 to respond to discovery.	.10	35.00
Poz, N.	5/17/23	Review recent communication with Insurer #25 counsel re discovery deficiencies and Insurers #18, #19, and #20 responses to plaintiffs' production of documents.	.40	140.00

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Name	Date	Services	Hours	Amount
Dougherty, J.	5/17/23	Continue analysis of documents introduced as exhibits to defensive witnesses.	4.20	3,465.00
Gilbert, S.	5/18/23	Confer with R. Shore re insurance issues and strategy.	1.00	1,950.00
Gilbert, S.	5/18/23	Confer with UCC re insurance strategy.	.80	1,560.00
Shore, R.	5/18/23	Confer with R. Leveridge and J. Rubinstein re strategy.	.70	1,120.00
Shore, R.	5/18/23	Draft talking points in preparation for call with UCC (1.2); confer with S. Gilbert re same (1.0); review relevant materials (1.2); confer with UCC re insurance strategy (0.8).	4.20	6,720.00
Shore, R.	5/18/23	Review letter re Issue #69 (0.3); revise same (0.6); confer with R. Leveridge and J. Rubinstein re same (0.7), communicate with co-counsel re same (0.4); review "final" version from A. Kramer (0.3).	2.30	3,680.00
Rubinstein, J.	5/18/23	Attend deposition preparation meeting with co-counsel and Deponent #6 (5.0); post-meeting discussion with co-counsel (0.3); confer with R. Leveridge and R. Shore re strategy (0.7); confer with co-counsel re strategy re case management hearing (0.3); review correspondence re Issue #69 (0.4).	6.70	6,700.00
Rush, M.	5/18/23	Review prior deposition transcripts in preparation for deposition of Deponent #17.	.40	330.00
Leveridge, R.	5/18/23	Communications with co-counsel re Issue #69.	2.40	3,840.00
Huddleston, D.	5/18/23	Analyze prior deposition transcript for Deponent #13.	1.50	787.50
Poz, N.	5/18/23	Communicate with Veritext re changes of deposition dates.	.10	35.00
Dougherty, J.	5/18/23	Continue reviewing documents introduced as exhibits to defensive witnesses re strategy.	3.40	2,805.00
Shore, R.	5/19/23	Review correspondence with Debtors' counsel re Issue #69.	.40	640.00
Rubinstein, J.	5/19/23	Analysis re Issue #69 (1.1); confer with R. Leveridge re Issue #69 and case management issues (0.7); communicate with co-counsel re strategy and hearing preparation re case management (0.8); review extension request from SRCS (0.1); review discovery correspondence (0.5); correspond with team re insurer objections to request for production (0.2); review materials re Deponent #21 (0.5).	3.90	3,900.00
Rubinstein, J.	5/19/23	Communicate with co-counsel re Insurer #25 discovery correspondence.	.40	400.00

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Name	Date	Services	Hours	Amount
Rush, M.	5/19/23	Continue drafting response to letter from Gulf/St. Paul.	4.00	3,300.00
Rush, M.	5/19/23	Continue reviewing prior deposition transcripts in preparation for deposition of Deponent #17.	3.40	2,805.00
Gaske, A.	5/19/23	Continue review of prior deposition transcript of Deponent #13.	1.60	1,160.00
Leveridge, R.	5/19/23	Review communications from Debtors' counsel re Issue #69.	.80	1,280.00
Leveridge, R.	5/19/23	Communications with co-counsel re hearing on May 23.	.70	1,120.00
Leveridge, R.	5/19/23	Review communication from D. Huddleston re Deponent #13 previous testimony.	.40	640.00
Leveridge, R.	5/19/23	Review communication from Consulting Expert A re project status.	.30	480.00
Agwu, I.	5/19/23	Review Insurers #18, #19, and #20 response to requests for document production.	.50	262.50
Poz, N.	5/19/23	Update case calendar to reflect changes in depositions schedule and extension of time for Insurer #23 to respond to plaintiffs' request for production of documents.	.20	70.00
Dougherty, J.	5/19/23	Continue reviewing documents introduced as exhibits to defensive witnesses.	2.90	2,392.50
Rubinstein, J.	5/21/23	Review Liberty discovery responses and next steps (0.2); correspond with J. Dougherty re project status (0.2); review status of National Union policy stipulation (0.1).	.50	500.00
Quinn, K.	5/22/23	Confer with R. Shore re insurance strategy.	.40	580.00
Shore, R.	5/22/23	Confer with co-counsel re preparation for status conference.	1.00	1,600.00
Shore, R.	5/22/23	Review P. Breene outline for status conference, points in support of stay and responses to anticipated insurer argument.	1.50	2,400.00
Shore, R.	5/22/23	Confer with R. Leveridge and J. Rubinstein re pending matters, including status conference strategy.	.90	1,440.00
Shore, R.	5/22/23	Review communication from A. Kramer and Reed Smith re insurance strategy (0.2); confer with K. Quinn re same (0.4).	.60	960.00

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Rubinstein, J.	5/22/23	Review draft argument in preparation for May 23 case management conference with Court (1.4); confer with R. Shore and R. Leveridge re strategy, including case management hearing preparation (0.9); review analysis by Consulting Expert A (0.6); review materials re Deponent #21 in preparation for deposition (3.3); confer with A. Gaske re policy stipulation projects (0.5).	6.70	6,700.00
Rush, M.	5/22/23	Draft letter to Gulf/St. Paul re Rule 30(b)(6) objections.	4.30	3,547.50
Rush, M.	5/22/23	Draft stipulation re notice issues.	.90	742.50
Gaske, A.	5/22/23	Confer with J. Rubinstein re case status.	.50	362.50
Gaske, A.	5/22/23	Revise memorandum re Issue #52.	.80	580.00
Leveridge, R.	5/22/23	Communicate with Consulting Expert A re analysis (0.6); begin review of analysis (0.6).	1.20	1,920.00
Leveridge, R.	5/22/23	Communicate with R. Shore and J. Rubinstein re status conference and related matters (0.9); communicate with co-counsel re same (0.2); review and revise outline of presentation by co-counsel (0.4); confer with co-counsel re same (0.6); communicate with R. Shore re same (0.2).	2.30	3,680.00
Turner, C.	5/22/23	Review and organize deposition materials for Deponent #16.	.50	112.50
Shore, R.	5/23/23	Review agenda and issues in preparation for status conference.	.80	1,280.00
Rubinstein, J.	5/23/23	Confer with co-counsel re debrief from status conference (1.7); review correspondence from insurer counsel re stay impact on discovery (0.1); communicate with team re deposition transcript of S. Odarczenko (0.1); revise correspondence to insurer counsel re discovery and communications with co-counsel re same (0.3).	2.20	2,200.00
Rush, M.	5/23/23	Review prior deposition transcripts in preparation for deposition of Deponent #17.	3.80	3,135.00
Leveridge, R.	5/23/23	Review agenda for status conference with Judge Lane (0.5); communicate with co-counsel (P. Breene) re same (0.4).	.90	1,440.00
Leveridge, R.	5/23/23	Confer with co-counsel re case management issues (0.8); communicate with J. Rubinstein re same (0.2); review communications to opposing counsel re same (0.3).	1.30	2,080.00
Turner, C.	5/23/23	Review and organize Deponent #16 deposition materials.	1.10	247.50
Dougherty, J.	5/23/23	Analyze documents used in depositions re strategy.	3.70	3,052.50

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Shore, R.	5/24/23	Analysis re next steps after potential stay of adversary proceeding.	1.20	1,920.00
Shore, R.	5/24/23	Confer with S. Sraders re Issue #69 strategy.	.20	320.00
Rubinstein, J.	5/24/23	Correspond with team re task status and next steps in light of status conference re case management (0.8); confer with R. Leveridge and C. Litherland re strategy (0.9); continue review of Deponent #21 documents re preparation for deposition (2.2); correspond with co-counsel re deposition scheduling (0.4).	4.30	4,300.00
Rush, M.	5/24/23	Confer with J. Rubinstein re current litigation projects.	.40	330.00
Rush, M.	5/24/23	Review prior deposition testimony of Deponent #17.	3.40	2,805.00
Gaske, A.	5/24/23	Draft memorandum re status of policy stipulations and location of relevant documents.	1.70	1,232.50
Leveridge, R.	5/24/23	Communicate with R. Shore and J. Rubinstein re strategy for potential stay of adversary proceeding (1.2); communicate with counsel for Deponent #13 (0.6); review communications re discovery from co-counsel (0.4).	2.20	3,520.00
Leveridge, R.	5/24/23	Review spreadsheets provided by Consulting Expert A (0.8); communicate with J. Rubinstein re same (0.5); communicate with Consulting Expert A re same (0.3).	1.60	2,560.00
Sraders, S.	5/24/23	Confer with R. Shore re Issue #69.	.20	145.00
Turner, C.	5/24/23	Review and organize Deponent #16 deposition materials.	.20	45.00
Poz, N.	5/24/23	Update correspondence tracking file to include communication between parties re temporary stay of discovery.	.10	35.00
Dougherty, J.	5/24/23	Analyze documents selected for preparation and use in depositions re strategy.	3.30	2,722.50
Rubinstein, J.	5/25/23	Communicate with team re discovery and deposition scheduling (0.4); review correspondence from M. Rush re Deponent #17 deposition preparation (0.2).	.60	600.00
Rush, M.	5/25/23	Review prior deposition testimony of Deponent #17.	2.50	2,062.50
Leveridge, R.	5/25/23	Communicate with counsel for Deponent #13 re deposition (0.4); communicate with co-counsel re same (0.4).	.80	1,280.00
Leveridge, R.	5/25/23	Review status of outstanding discovery projects.	.30	480.00
Dougherty, J.	5/25/23	Continue analyzing documents selected for preparation and use in depositions re strategy.	2.40	1,980.00

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Name	Date	Services	Hours	Amount
Shore, R.	5/29/23	Review materials re Issue #69 (2.7) review timing and focus of motion re Issue #69 (1.3); draft note re arguments in favor of same (2.0).	6.00	9,600.00
Shore, R.	5/30/23	Confer with R. Leveridge and J. Rubinstein re litigation strategy.	.70	1,120.00
Shore, R.	5/30/23	Confer with R. Leveridge, J. Rubinstein, and S. Sraders re Issue #69.	.80	1,280.00
Shore, R.	5/30/23	Analyze Second Circuit ruling and impact on adversary proceeding.	1.50	2,400.00
Shore, R.	5/30/23	Revise memorandum re Issue #69.	.30	480.00
Rubinstein, J.	5/30/23	Confer with R. Shore, R. Leveridge, and S. Sraders re Issue #69 analysis (0.8); confer with R. Shore and R. Leveridge re strategy (0.7); analyze status of all projects across case to determine next steps/stop points in light of potential stay (1.6); review policy stipulation status memorandum (0.2).	3.30	3,300.00
Rush, M.	5/30/23	Continue research re Issue #14.	1.60	1,320.00
Leveridge, R.	5/30/23	Review communications from R. Shore re Issue #69.	.40	640.00
Leveridge, R.	5/30/23	Communicate with co-counsel re Second Circuit ruling affirming plan.	.90	1,440.00
Leveridge, R.	5/30/23	Review relevant opinion (0.6); confer with R. Shore, J. Rubinstein and S. Sraders re same (0.8).	1.40	2,240.00
Leveridge, R.	5/30/23	Confer with J. Rubinstein and R. Shore re litigation strategy in light of developments in case.	.70	1,120.00
Leveridge, R.	5/30/23	Confer with P. Breene re developments in case and next steps.	.40	640.00
Sraders, S.	5/30/23	Confer with R. Shore, R. Leveridge, and J. Rubinstein re Issue #69.	.80	580.00
Sraders, S.	5/30/23	Review relevant opinion.	.20	145.00
Gilbert, S.	5/31/23	Confer with R. Shore and R. Leveridge re insurance strategy.	.90	1,755.00
Shore, R.	5/31/23	Confer with S. Gilbert and R. Leveridge re impact of Second Circuit decision on adversary.	.90	1,440.00
Shore, R.	5/31/23	Review report from re timing of next steps given Second Circuit decision.	.30	480.00
Shore, R.	5/31/23	Communicate with R. Leveridge re Issue #69.	.30	480.00
Shore, R.	5/31/23	Communicate with R. Leveridge and J. Rubinstein re Issue #69.	.40	640.00
Rubinstein, J.	5/31/23	Communicate with team re status conference continuance (0.1); update task list (0.5); confer with R. Leveridge re strategy (0.3); revise strategy memorandum re case management (0.8).	1.70	1,700.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	5/31/23	Communicate with co-counsel and opposing counsel re proposed date and time for status conference.	.60	960.00
Leveridge, R.	5/31/23	Confer with R. Shore and S. Gilbert re strategic issues relating to Second Circuit ruling and insurance litigation.	.70	1,120.00
Leveridge, R.	5/31/23	Revise memorandum re Issue #69 (1.7); communicate with R. Shore and J. Rubinstein re same (0.4).	2.10	3,360.00
Leveridge, R.	5/31/23	Communicate with J. Rubinstein re status of projects in adversary.	.40	640.00
Leveridge, R.	5/31/23	Review communication from Consulting Expert A re project.	.20	320.00
		Project Total:	428.70	\$ 403,029.00
TOTAL CHARGEABLE HOURS			495.20	
TOTAL FEES				\$ 458,684.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	12.30	1,950.00	23,985.00
Quinn, K.	3.00	1,450.00	4,350.00
Shore, R.	44.60	1,600.00	71,360.00
Rubinstein, J.	26.40	500.00	13,200.00
Rubinstein, J.	104.80	1,000.00	104,800.00
Rush, M.	10.80	412.50	4,455.00
Rush, M.	74.50	825.00	61,462.50
Gaske, A.	24.90	725.00	18,052.50
Leveridge, R.	45.00	1,600.00	72,000.00
Ogrey, S.	16.60	265.00	4,399.00
Sraders, S.	6.90	725.00	5,002.50
Turner, C.	23.60	225.00	5,310.00
Huddleston, D.	20.20	525.00	10,605.00
Agwu, I.	18.90	525.00	9,922.50
Poz, N.	4.10	350.00	1,435.00
Dougherty, J.	58.60	825.00	48,345.00
TOTALS	495.20		\$ 458,684.00

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TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	6.00	1,350.00
A008	Hearings	6.00	8,400.00
A009	Meetings / Communications with AHC & Creditors	7.80	13,380.00
A015	Non-Working Travel (Billed @ 50%)	37.20	17,655.00
A019	Plan / Disclosure Statement	9.50	14,870.00
A020	Insurance Adversary Proceeding	428.70	403,029.00

EXPENSE DETAILS

E110: Out-of-Town Travel

Date	Description	Task	Amount
5/10/23	Travel - Airfare / Mike Rush / Washington, DC to Chicago, IL (Roundtrip / Coach fare) / Attend Purdue deposition / May 9-10, 2023	E110	435.80
5/10/23	Travel - Parking / Mike Rush / Chicago, IL / Attend Purdue deposition / May 9-10, 2023	E110	58.00
5/10/23	Travel - Lodging / Mike Rush / Chicago, IL / Attend Purdue deposition / May 9-10, 2023 (1 night)	E110	350.00
5/10/23	Travel - Meals / Mike Rush / Chicago, IL / Attend Purdue deposition / May 9-10, 2023	E110	102.39
5/10/23	Travel - Miscellaneous / Mike Rush / Washington, DC to Chicago, IL (Roundtrip) / Attend Purdue Deposition / Baggage Fees / May 9-10, 2023	E110	70.00
5/11/23	Travel - Airfare / Jason Rubinstein / Washington, DC to Chicago, IL and Chicago, IL to Stamford, CT (Coach fare) / Attend depoosition and deposition preparation session / May 9-11, 2023	E110	434.80
5/11/23	Travel - Train Fare / Jason Rubinstein / Stamford, CT to Washington, DC / Attend deposition preparation session / May 11, 2023	E110	337.00
5/11/23	Travel - Lodging / Jason Rubinstein / Chicago, IL / Attend deposition / May 9-11, 2023	E110	700.00
5/11/23	Travel - Taxi Fare / Jason Rubinstein / Chicago, IL and Stamford, CT / Attend deposition in Chicago, IL and deposition preparation session in Stamford, CT / May 9-11, 2023	E110	356.71
5/11/23	Travel - Meals / Jason Rubinstein / Chicago, IL and Stamford, CT / Attend deposition / May 9-11, 2023	E110	125.96
5/18/23	Travel - Mileage / Jason Rubinstein / Roundtrip Potomac, MD to/ from Stamford, CT / Attend deposition preparation session / 05.18.2023 (643 miles @ \$0.655 / mile)	E110	421.17
5/18/23	Travel - Tolls / Jason Rubinstein / Stamford, CT / Attend deposition preparation session / 05.18.2023	E110	13.61
5/18/23	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend deposition preparation session / 05.18.2023	E110	18.64
Sub-Total of Expenses:			\$ 3,424.08

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E107: Delivery Services/Messenger

Date	Description	Task	Amount
5/05/23	Messenger & Delivery / United Parcel Service / Reed Smith LLP / 5.5.23	E107	197.33
	Sub-Total of Expenses:		\$ 197.33

E115: Deposition Transcripts

Date	Description	Task	Amount
5/10/23	Deposition / Transcript / Veritext / Deposition Transcript of S. Odarczenko	E115	2,284.35
	Sub-Total of Expenses:		\$ 2,284.35

E118: Litigation Support Vendors

Date	Description	Task	Amount
4/30/23	Contracted Professional Services / Cobra Legal Solutions LLC / Hosting/ User License: 4.2023	E118	859.75
	Sub-Total of Expenses:		\$ 859.75

TOTAL EXPENSES **\$ 6,765.51**

TOTAL FEES AND EXPENSES **\$ 465,449.51**